

FILED

APR 20 2023

CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF OHIO
CLEVELAND

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

) I N D I C T M E N T

Plaintiff,

)
1:23 CR 00217
CASE NO.

v.

VERONICA GRAHAM,

) Title 18, United States Code,
Defendant.) Sections 922(a)(6) and 924(a)(2)

)
JUDGE FLEMING

COUNT 1

(Making a False Statement in Acquisition of a Firearm, 18 U.S.C. §§ 922(a)(6) and 924(a)(2))

The Grand Jury charges:

1. On or about November 13, 2021, in the Northern District of Ohio, Eastern Division, Defendant VERONICA GRAHAM, in connection with the acquisition of firearms, to wit: Smith & Wesson, Model SD40VE, 40 caliber semi-automatic pistol, Serial Number FDM2460 and a Taurus Armas, Model 856, 38 caliber revolver, Serial Number ACK356247, from Shoot Point Blank, 5957 Heisley Road, Mentor, Ohio 44060, a federally licensed dealer of firearms, did knowingly and unlawfully make and cause to be made false and fictitious statements, intended and likely to deceive said dealer with respect to facts material to the lawfulness of the sale and acquisition of said firearms under the provisions of Chapter 44, Title 18 of the United States Code, in that Defendant did knowingly state and represent on Federal Firearms Transaction Records, those are, ATF Forms 4473, that she was the actual buyer of said

firearms, when in fact, she was not the actual buyer of the firearms, in violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

A TRUE BILL.

Original document- Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.